

Intercontinental Terminals Company (ITC) Fire Morning Update Deer Park, Texas March 27, 2019 1200 – March 28, 2019 0400

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities

conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- ITC Hydro cutting activities on tank 80-14 and 80-15 were put on hold due to parts not arriving yet and the decision was made that it would be safer to do during daylight hours on March 28, 2019. Pumping of Tank 80-13 (toluene) continued overnight and is expected to be completed on March 28, 2019. Also, on March 28, 2019, tanks 80-2 and 80-3 will be evaluated for product removal.
- On March 27, 2019, the Texas Department of State Health Services has issued a warning to not eat fish caught in the Houston Ship Channel.
- On March 27, 2019, The Strike Team, comprised of CST on behalf of TCEQ, EPA, and the Center for Toxicology and Environmental Health (CTEH) were sent to Houston Fuel Terminal Dock 3 at 11:42 pm to investigate a complaint about gaseous odors. The strike team observed visible material on the water and recorded a reading of 0.05 ppm of benzene.
- The United States Coast Guard (USCG) has currently recovered 24,364 barrels of material from water operations. Approximately 35,724 barrels of material from the tank farm has been recovered. 128 cubic yards of solid waste has been generated. 12,600 feet of boom was deployed on March 27, 2019. 77,600 feet of 18" boom has been deployed and 2,640 feet of offshore 67" of boom has also been deployed. These numbers do not account for Tucker Bayou boom.
- On March 27, 2019, ITC submitted a Decanting Plan for review and comment by EPA and TCEQ.
 EPA and TCEQ discussed ITC's desire to decant liquids pulled from the bayou and ditch to help with
 storage capacity. Because the fluid will be considered a Resource Conservation and Recovery Act
 (RCRA) hazardous waste, decanting would be considered treatment, so it would not be allowed.
- The Texas Poison Control Network has received a total of 230 calls from March 17, 2019 to March 27, 2019 as of 9:00 am on March 27, 2019. Of these calls, 172 calls were exposures and 58 were requests for information calls.
- On March 27, 2019, ITC asked whether the boom being used would have to be disposed of, or if it
 could be cleaned for reuse. TCEQ will investigate an answer.
- To prevent reignition and reduce emissions, foaming of the secondary containment continues as necessary.
- Several entities including TCEQ, EPA, the 6th Civil Support Team (CST), and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on March 27, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs for toluene and xylene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 ppm). These exceedances of the short-term AMCV for benzene were located northwest of the ITC site and have been shared with unified command and local officials.
- EPA conducted handheld air monitoring from March 27, 2019 (12:00 pm) to March 28, 2019 (4:00 am) at 37 locations in areas located north and southwest of the Site as well as on the ship channel. Results were reported above the detection limit at three locations for total volatile organic compounds (VOCs) and benzene. Benzene was detected at two of these locations above the short-term AMCVs for benzene (0.18 ppm). EPA will conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if the short-term AMCV for benzene continues to be exceeded.
- ITC continued air monitoring on March 27, 2019 (midnight to midnight); there were 3,220 volatile organic compound (VOC) readings (603 detections) with and 2,204 benzene readings (424 detections).
- TCEQ continued handheld air monitoring between 2:00 pm and 10:00 pm on March 27, 2019 (39 readings). No significant readings were detected.

- On March 27, 2019, Unified Command developed, reviewed, and approved the Incident Action Plan (#6) for the next operational period.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on a 24-hour basis.

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	7	7	14
EPA Non-Region 6	0	4	4
START	1	14	15
Other Contractors	0	8	8
Total	8	33	41

Additional Information: Air Monitoring and Water Sampling locations:



